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Attorney(s) for Creditor and Party-in-Interest
CITY OF SAN JOSE

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---|---|---|
| In re |) | Case Nos. 19-30088 DM (Lead Case) |
| |) | 19-30089 DM |
| PG&E CORPORATION |) | |
| |) | Chapter 11 |
| -and- |) | Jointly Administered |
| |) | |
| PACIFIC GAS AND ELECTRIC |) | |
| COMPANY |) | JOINDER OF CITY OF SAN JOSE TO |
| |) | SONOMA CLEAN POWER AUTHORITY'S |
| Debtors. |) | LIMITED OBJECTION TO DEBTOR'S BAR |
| |) | DATE MOTION [Docket No. 1784] |
| <input type="checkbox"/> Affects PG&E Corporation |) | |
| |) | Date: June 11, 2019 |
| <input type="checkbox"/> Affects Pacific Gas and Electric Company |) | Time: 9:30 a.m. |
| |) | Courtroom: 17 |
| <input checked="" type="checkbox"/> Affects both Debtors. |) | Place: 450 Golden Gate Ave., 16 th Floor |
| |) | San Francisco, CA 94102 |
| * All papers shall be filed in the Lead Case |) | Judge: Hon. Dennis Montali |
| No. 19-30088 DM |) | |
| |) | Objection Deadline: May 31, 2019 |

The City of San Jose (the “The City”), a claimant and party-in-interest in the above-captioned chapter 11 cases of Pacific Gas and Electric Company (the “Utility”) and PG&E Corporation (“PG&E” and, together with the Utility, the “Debtors”), joins in the Limited Objection of the Sonoma Clean Power Authority (“SCPA”) [Docket No. 2321] to the Debtors’ Bar Date Motion (“Bar Date Motion”) [Docket No. 1784] (the “SCPA Objection”). The City generally shares the concerns identified in the SCPA Objection, as follows:

I. JOINDER

The City’s interest in the SCPA Objection is as a creditor and on behalf of the many thousands of customers that the Debtors serve in The City.

The Bar Date Motion lacks sufficient and important clarity on the nature and scope of “claims” that must be filed, and can be interpreted as overly broad, covering both “Future Harm Claims” and “Unknown Claims.”¹ The proposed process and rules for filing and content of claims is unnecessarily complex and puts potential creditors at an unfair disadvantage. The City agrees with SCPA that it is inappropriate to model the claims approach in Debtors’ case on asbestos and other mass tort cases that are distinguishable from the Debtors’ current circumstance.

The City shares the following concerns identified in the SCPA Objection: (A) the Debtors have a fiduciary duty to provide clarity and notice regarding claim scope and process concerning requirements not fairly contemplated nor easily understood by potentially thousands of creditors; (B) the Debtors’ proposed claims process does not facilitate a fair and orderly reorganization, since it drives the need to file protective/defensive claims based on unknown events, such as future fires; (C) the Debtors’ reliance on an asbestos/mass tort model for “unmatured” or contingent claims is not appropriate under the circumstances of this case; (D) the Debtors fail to justify why it is necessary to deal with Future Harms Claims and Unknown Claims at this early stage of the case; (E) the Bar Date Motion would unfairly shift claim identification responsibility from the Debtors to governmental units and other potential creditor-victims; (F) the Bar Date Motion, whether advertently or inadvertently, potentially prejudices thousands of creditors, whose claims may be disallowed in

¹ For purposes of this Joinder, the definition of “Future Harms Claims” and “Unknown Claims” are as set forth in SCPA’s Objection.

1 favor of equity and other inferior classes; and (G) the Bar Date Motion does not coordinate the
2 timing of potential Section 365 rejection claims with the related claims process.

3 The City respectfully requests that any bar date order: (A) require Debtors to provide
4 adequate and sufficiently detailed notice to establish a clear and reasonable definition of claims; (B)
5 prohibit Debtors from asserting bar date or other discharge or plan injunction provisions against
6 Future Harm Claims and Unknown Claims; (C) establish an early deadline to resolve “force of law”
7 contract rejection disputes, such as those related to CCA service agreements, as a means to address
8 the application of the bar date to claims beyond section 365(g); (D) provide for liberal claim
9 amendment rights, and; (E) prohibit Debtors from imposing burdensome procedural or content
10 requirements for claims.

11 II. CONCLUSION

12 The Bar Date Motion leaves creditors like The City little choice: either file wide-ranging
13 protective claims that reserve all Future Harm Claims and Unknown Claims that the creditor can
14 possibly contemplate or risk later disputes with Debtors regarding objections, discharge or
15 injunctions. With another fire season soon to be underway, Debtors’ infrastructure will once again
16 be tested and risks associated with widespread and excessive defensive blackouts, among other
17 potential risks, can also be expected. Now is not the time to allow Debtors, through the Bar Date
18 Motion, to shift the risk of future harm from Debtors to Debtors’ creditors. For the reasons set forth
19 herein, The City joins in the SCPA Objection and requests that the Court provide the relief requested
20 by SCPA.

21 DATED: May 31, 2019.

RESPECTFULLY SUBMITTED,

22 DAVIS WRIGHT TREMAINE LLP

23 By: /s/ Harvey S. Schochet
24 Harvey S. Schochet

25 *Attorneys for Creditor and Party-in-Interest,*
26 *The City of San Jose*
27
28

CERTIFICATE OF SERVICE

I am employed in the County of San Francisco; my business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111. I am over the age of eighteen years and not a party to the foregoing action.

On May 31, 2019, I served the within:

JOINDER OF CITY OF SAN JOSE TO SONOMA CLEAN POWER AUTHORITY'S LIMITED OBJECTION TO DEBTOR'S BAR DATE MOTION [Docket No. 1784]

- ☒ BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address amandahenderson@dwt.com to the persons at the e-mail addresses listed in the attached **Exhibit A**, based on a court order or an agreement of the parties to accept service by email or electronic transmission.
- ☒ MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed to all parties listed on the attached **Exhibit B**.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on May 31, 2019 at San Francisco, California.


Amanda L. Henderson

Exhibit A

Exhibit A – Service List Email Only

| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
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| Counsel for Genesys | Arent Fox LLP | Attn: Andy S. Kong and | Beth.Brownstein@arentfox.com; | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
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| Individual Plaintiffs Executive Committee appointed by the California Superior Court in the North Bay Fire Cases, Judicial Council Coordination Proceeding Number 4955, Pursuant to the terms of the Court's Case Management Order No. 1 | Cotchett, Pitre & McCarthy, LLP | Attn: Frank M. Pitre, Alison E. Cordova, Abigail D. Blodgett San Francisco Airport Office Center 840 Malcoln Road, Suite 200 Burlingame CA 94010 | fpitre@cpmlegal.com; acordova@cpmlegal.com; ablodgett@cpmlegal.com | Email |
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| Counsel to Dynegy Marketing and Trade, LLC | Latham & Watkins LLP | Attn: Caroline A. Reckler, Andrew M. Parlen 885 Third Avenue New York NY 10022-4834 | christopher.harris@lw.com; andrew.parlen@lw.com | Email |
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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|---|-----------------------------------|--|--|-------------------|
| Counsel for International Brotherhood of Electrical Workers Local Union 1245 | Locke Lord LLP | Attn: Bradley C. Knapp 601 Poydras Street Suite 2660 New Orleans LA 70130 | sbryant@lockelord.com | Email |
| Counsel for International Brotherhood of Electrical Workers Local Union 1245 | Locke Lord LLP | Attn: W. Steven Bryant 600 Congress Street Suite 2200 Austin TX 78701 | bknapp@lockelord.com | Email |
| Counsel for California Power Exchange Corporation | LOEB & LOEB LLP | Attn: Marc S. Cohen, Alicia Clough 10100 Santa Monica Blvd Suite 2200 Los Angeles CA 90067 | mscohen@loeb.com | Email |
| Counsel to Public Employees Retirement Association of New Mexico | LOWENSTEIN SANDLER LLP | Attn: Michael S. Etkin, Andrew Behlmann & Gabriel L. Olivera One Lowenstein Drive Roseland NJ 070068 | abehlmann@lowenstein.com; golivera@lowenstein.com | Email |
| Interested Party | Macdonald Fernandez LLP | Attn: Iain A. Macdonald 221 Sansome Street Third Floor San Francisco CA 94104-2323 | imac@macfern.com | Email |
| Counsel to Aegion Corporation and its subsidiary entities: Corpro Companies, Inc., Insituform Technologies, LLC and Fibwrap Construction Services, Inc. | MARGULIES FAITH, LLP | ATTN: CRAIG G. MARGULIES 16030 VENTURA BOULEVARD SUITE 470 ENCINO CA 91436 | Craig@MarguliesFaithLaw.com | Email |
| Counsel for Ghost Ship Warehouse Plaintiffs' Executive Committee | MARY ALEXANDER & ASSOCIATES, P.C. | Attn: Mary E. Alexander 44 Montgomery Street, Suite 1303 San Francisco CA 94104 | malexander@maryalexander.com | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|---|---|--|--|-------------------|
| Counsel to Winners Industry Co., Ltd. | McKool Smith, P.C. | Attn: James H. Smith One Bryant Park, 47th Floor New York NY 10036 | jsmith@mckoolsmith.com | Email |
| Counsel for the Official Committee of Unsecured Creditors | Milbank LLP | Attn: Paul S. Aronzon, Gregory A. Bray, Thomas R. Kreller 2029 Century Park East, 33rd Floor Los Angeles CA 90067 | Paronzon@milbank.com; Ggray@milbank.com | Email |
| Counsel for Marin Clean Energy | Mintz Levin Cohn Ferris Glovsky and Popeo, P.C. | Attn: Abigail V. O'Brient, Andrew B. Levin 2029 Century Park East Suite 3100 Los Angeles CA 90067 | avobrient@mintz.com; ablevin@mintz.com | Email |
| Counsel for Exponent, Inc. | Newmeyer & Dillion LLP | Attn: James J. Ficenec, Joshua B. Bevitz 1333 N. California Blvd Suite 600 Walnut Creek CA 94596 | Joshua.Bevitz@ndlf.com | Email |
| Counsel for CALIFORNIA SELF-INSURERS' SECURITY FUND | NIXON PEABODY LLP | Attn: MAXIMILIAN A. FERULLO 55 West 46th Street New York NY 10036 | mferullo@nixonpeabody.com | Email |
| Counsel for CALIFORNIA SELF-INSURERS' SECURITY FUND | NIXON PEABODY LLP | Attn: RICHARD C. PEDONE Exchange Place 53 State Street Boston MA 02109 | rpedone@nixonpeabody.com | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|--|-----------------------------------|---|---|-------------------|
| Counsel for Michael Vairo, Marie Dierssen, Catherine McClure, Tonia Hanson, Deirdre Coderre, Denise Stooksberry, John Stooksberry, Bryan Sullivan, Sara Hill, Isaiah Vera, Michael Williams, Joel Batts, Annaleisa Batts, Claudia Bijstra, Andries Bijstra, Roger Martinez, Candice Seals, Gretchen Franklin, Christopher Franklin, Paul Bowen, Kelly Jones, Tami Coleman, Cecil Morris, Linda Schooling, Jennifer Makin, Barbara Cruise, Benjamin Hernandez, Irma Enriquez, Constantina Howard, Leroy Howard, Edward Delongfield, Brenda Howell, Lynda Howell, Angela Coker, Sally Thorp, Paradise Moose Lodge, Nancy Seals | Northern California Law Group, PC | Attn: Joseph Feist 2611 Esplanade Chico CA 95973 | joe@norcallawgroup.net | Email |
| Counsel for NextEra Energy Inc., NextEra Energy Partners, L.P. | NORTON ROSE FULBRIGHT US LLP | Attn: Howard Seife, Andrew Rosenblatt, Christy Rivera 1301 Avenue of the Americas New York NY 10019-6022 | howard.seife@nortonrosefulbright.com; andrew.rosenblatt@nortonrosefulbright.com; christy.rivera@nortonrosefulbright.com | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|--|---|---|--|-------------------|
| Counsel to Department of Finance for the State of California and Governor Gavin Newsom | O'MELVENY & MYERS LLP | Attn: John J. Rapisardi, Nancy A. Mitchell and Daniel S. Shamah 7 Times Square New York NY 10036 | jrapisardi@omm.com;nmitchell@omm.com;dshamah@omm.com | Email |
| Office of the California Attorney General | Office of the California Attorney General | Attn: Bankruptcy Dept P.O. Box 94255 Sacramento CA 94244-2550 | bankruptcy@coag.gov | Email |
| Office of the United States Trustee | Office of the United States Trustee | Attn: James L. Snyder, Esq. & Timothy LaFreddi, Esq., Marta E. Villacorta 450 Golden Gate Ave Suite 05-0153 San Francisco CA 94102 | James.L.Snyder@usdoj.gov | Email |
| Counsel for EDP Renewables North America LLC, Rising Tree Wind Farm II LLC, and Arlington Wind Power Project LLC | Orrick, Herrington & Sutcliffe LLP | Attn: Debra Felder 1152 15th Street, NW Washington DC 20005 | Imcgowen@orrick.com | Email |
| Counsel to Centerbridge Partners, L.P. | ORRICK, HERRINGTON & SUTCLIFFE LLP | Attn: Douglas S. Mintz Columbia Center 1152 15th Street, N.W. Washington DC 20005-1706 | dfelder@orrick.com | Email |
| Counsel for EDP Renewables North America LLC, Rising Tree Wind Farm II LLC, and Arlington Wind Power Project LLC | Orrick, Herrington & Sutcliffe LLP | Attn: Lorraine McGowen 51 West 52nd Street New York NY 10019 | dmintz@orrick.com | Email |
| Counsel for The Baupost Group, L.L.C., as the general partner and investment manager for certain entities | Pachulski Stang Ziehl & Jones LLP | Attn: Isaac M. Pachulski, Debra I. Grassgreen, Gabriel I. Glazer, John W. Lucas 150 California Street 15th Floor San Francisco CA 94111 | ipachulski@pszjlaw.com | Email |

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|--|--|---|--|-------------------|
| Counsel to California Public Utilities Commission | Paul, Weiss, Rifkind, Wharton & Garrison LLP | Attn: Alan W. Kornberg, Brian S. Hermann, Walter R. Rieman, Sean A. Mitchell, Neal P. Donnelly 1285 Avenue of the Americas New York NY 10019-6064 | bhermann@paulweiss.com; wrieman@paulweiss.com; smitchell@paulweiss.com; ndonnelly@paulweiss.com | Email |
| Counsel for Bank of America, N.A. | Pillsbury Winthrop Shaw Pittman LLP | Attn: Leo T. Crowley 1540 Broadway New York NY 10036 | leo.crowley@pillsburylaw.com | Email |
| Counsel for Ad Hoc Group of Institutional Par Bondholders of Pacific Gas and Electric Co. | Proskauer Rose LLP | Attn: Martin J. Bienenstock, Brian S. Rosen, Maja Zerjal Eleven Times Square New York NY 10036-8299 | mbienenstock@proskauer.com; brosen@proskauer.com; mzerjal@proskauer.com | Email |
| Counsel for Ad Hoc Group of Institutional Par Bondholders of Pacific Gas and Electric Co. | Proskauer Rose LLP | Attn: Michael A. Firestein, Lary Alan Rappaport, Steve Y. Ma 2029 Century Park East Suite 2400 Los Angeles CA 90067-3010 | mfirestein@proskauer.com; sma@proskauer.com | Email |
| Interested Party Provencher & Flatt | Provencher & Flatt, LLP | Attn: Douglas B. Provencher 823 Sonoma Avenue Santa Rosa CA 95404 | dbp@provlaw.com | Email |
| Counsel for Creditors Nevada Irrigation District, Counsel for Attorneys for Creditors Lodi Gas Storage, L.L.P. Wild Goose, LLC | Reed Smith LLP | Attn: Monique B. Howery 10 S. Wacker Drive 40th Floor Chicago IL 60606 | mhowery@reedsmith.com | Email |
| Counsel for Bank of New York Mellon | Reed Smith LLP | Attn: Robert P. Simons 225 Fifth Avenue Suite 1200 Pittsburgh PA 15222 | rsimons@reedsmith.com | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|--|------------------|---|--|-------------------|
| Counsel for Pivot Interiors, Inc. | RIMON, P.C. | Attn: Lillian G. Stenfeldt One Embarcadero Center Suite 400 San Francisco CA 94111 | lillian.stenfeldt@rimonlaw.com | Email |
| Individual Plaintiffs Executive Committee appointed by the California Superior Court in the North Bay Fire Cases, Judicial Council Coordination Proceeding Number 4955, Pursuant to the terms of the Court's Case Management Order No. 1 | Robins Cloud LLP | Attn: Bill Robins, III, Robert Bryson 808 Wilshire Boulevard Site 450 Santa Monica CA 90401 | robins@robinscloud.com; rbryson@robinscloud.com | Email |
| Counsel for ELLIOTT MANAGEMENT CORPORATION, on behalf of itself and certain funds and accounts managed, advised, or sub-advised by it | ROPES & GRAY LLP | Attn: Gregg M. Galardi, Keith H. Wofford, Daniel G. Egan 1211 Avenue of the Americas New York NY 10036-8704 | mark.bane@ropesgray.com; matthew.roose@ropesgray.com | Email |
| Counsel for The Baupost Group L.L.C., as the managing general partner and/or investment manager for certain entities | Ropes & Gray LLP | Attn: Matthew M. Roose, Mark I. Bane 1211 Avenue of the Americas New York NY 10036-8704 | peter.welsh@ropesgray.com; joshua.sturm@ropesgray.com; patricia.chen@ropesgray.com | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|---|--------------------------|---|---|-------------------|
| Counsel for The Baupost Group L.L.C., as the managing general partner and/or investment manager for certain entities | Ropes & Gray LLP | Attn: Peter L. Welsh, Joshua Y. Sturm, & Patricia I. Chen Prudential Tower 800 Boylston Street Boston MA 02199-3600 | keith.wofford@ropesgray.com; daniel.egan@ropesgray.com | Email |
| Counsel for ELLIOTT MANAGEMENT CORPORATION, on behalf of itself and certain funds and accounts managed, advised, or sub-advised by it | ROPES & GRAY LLP | Attn: Stephen Moeller-Sally, Matthew L. McGinnis Prudential Tower, 800 Boylston Street Boston MA 02199-3600 | ssally@ropesgray.com; matthew.mcginis@ropesgray.com | Email |
| Counsel for Creditor ARB, INC. | RUTAN & TUCKER, LLP | Attn: Roger F. Friedman, Philip J. Blanchard 611 Anton Boulevard Suite 1400 Costa Mesa CA 92626-1931 | pblanchard@rutan.com | Email |
| Counsel for International Business Machines Corp. | Satterlee Stephens LLP | Attn: Christopher R. Belmonte, Esq., Pamela A. Bosswick, Esq. 230 Park Avenue New York NY 10169 | cbelmonte@ssbb.com; pbosswick@ssbb.com | Email |
| COUNSEL TO MARIE VALENZA, BRANDEE GOODRICH, KRISTAL DAVIS-BOLIN, ASHLEY DUTSMAN, BARBARA MORRIS, MARY HAINES | SAVAGE, LAMB & LUNDE, PC | ATTN: E. RYAN LAMB 1550 Humboldt Road, Suite 4 CHICO CA 95928 | erlamblaw@gmail.com | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|--|------------------------------------|--|--|-------------------|
| Counsel for Turner Construction Company Case | Seyfarth Shaw LLP | Attn: M. Ryan Pinkston, Christopher J. Harney 560 Mission Street Suite 3100 San Francisco CA 94105 | charney@seyfarth.com | Email |
| Counsel for East Bay Community Energy Authority | Shermanlaw | Attn: David B. Shemano 1801 Century Park East Suite 1600 Los Angeles CA 90067 | dshemano@shemanolaw.com | Email |
| Counsel for TURN – The Utility Reform Network | Silicon Valley Law Group | Attn: David V. Duperrault, Kathryn E. Barrett One North Market Street Suite 200 San Jose CA 95113 | dvd@svlg.com | Email |
| Counsel to the Board of PG&E Corporation and Pacific Gas and Electric Company and Certain Current and Former Independent Directors | SIMPSON THACHER & BARTLETT LLP | Attn: Michael H. Torkin, Nicholas Goldin, Kathrine A. McLendon, Jamie J. Fell 425 Lexington Avenue New York NY 10017 | michael.torkin@stblaw.com; ngoldin@stblaw.com; kmcledon@stblaw.com; jamie.fell@stblaw.com | Email |
| Counsel for Creditor and Party-in-Interest Sonoma Clean Power Authority | Sonoma Clean Power Authority | Attn: Jessica Mullan, General Counsel 50 Santa Rosa Avenue Fifth Floor Santa Rosa CA 95494 | jnullan@sonomacleanpower.org | Email |
| Counsel for Southern California Edison Company | Southern California Edison Company | Attn: Julia A. Mosel, Patricia A. Cirucci 2244 Walnut Grove Avenue 3rd Floor Rosemead CA 91770 | Julia.Mosel@sce.com; patricia.cirucci@sce.com | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|--|---|--|---|-------------------|
| Counsel to Allianz Global Corporate & Specialty | Stevens & Lee, P.C. | Attn: Constantine D. Pourakis 485 Madison Avenue 20th Floor New York NY 10022 | lpg@stevenslee.com | Email |
| Counsel to Allianz Global Corporate & Specialty | Stevens & Lee, P.C. | Attn: Leonard P. Goldberger 620 Freedom Business Center Suite 200 King of Prussia PA 19406 | cp@stevenslee.com | Email |
| Counsel for Liberty Mutual Life Insurance Company | Stewart Sokol & Larkin LLC | Attn: Jan D. Sokol, Esq., Kevin M. Coles, Esq. 2300 SW First Avenue, Suite 200 Portland OR 97201 | kcoles@lawssl.com | Email |
| Counsel for Tanforan Industrial Park, LLC | STEYER LOWENTHAL BOODROOKAS ALVAREZ & SMITH LLP | Attn: Jeffrey H. Lowenthal One California Street Third Floor San Francisco CA 94111 | jlowenthal@steyerlaw.com | Email |
| Counsel for Mizuho Bank, Ltd. | STROOCK & STROOCK & LAVAN LLP | Attn: David W. Moon 2029 Century Park East Los Angeles CA 90067-3086 | khansen@stroock.com; egilad@stroock.com; mgarofalo@stroock.com | Email |
| Counsel for JPMorgan Chase Bank, N.A., as DIP Administrative Agent | Stroock & Stroock & Lavan LLP | Attn: Frank A. Merola 2029 Century Park East Los Angeles CA 90067-3086 | fmerola@stroock.com | Email |
| Counsel for JPMorgan Chase Bank, N.A., as DIP Administrative Agent | Stroock & Stroock & Lavan LLP | Attn: Kristopher M. Hansen, Erez E. Gilad, Matthew G. Garofalo 180 Maiden Lane New York NY 10038-4982 | khansen@stroock.com; egilad@stroock.com; mgarofalo@stroock.com; holsen@stroock.com; mspeiser@stroock.com; kpasquale@stroock.com; smillman@stroock.com | Email |
| Counsel for Mizuho Bank, Ltd. | STROOCK & STROOCK & LAVAN LLP | Attn: Mark A. Speiser, Kenneth Pasquale, Sherry J. Millman, Harold A. Olsen 180 Maiden Lane New York NY 10038-4982 | dmoon@stroock.com | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|---|---|---|--|-------------------|
| Counsel for Creditors Public Entities Impacted by the Wildfires | Stutzman, Bromberg, Esserman & Plifka, P.C. | Attn: Sander L. Esserman, Cliff I. Taylor 2323 Bryan Street Suite 2200 Dallas TX 5201-2689 | esserman@sbep-law.com; taylor@sbep-law.com | Email |
| Counsel for BrightView Enterprise Solutions, LLC, Counsel for Granite Construction Incorporated, BrightView Landscape Services, Inc. | Taylor English Duma LLP | Attn: John W. Mills, III 1600 Parkwood Circle Suite 200 Atlanta GA 30339 | jmls@taylorenglish.com | Email |
| Counsel to Road Safety, Inc. | The Bankruptcy Group, P.C. | Attn: Stephan Brown and Daniel Griffin 3300 Douglas Blvd. Ste. 100 Roseville CA 95661 | daniel@thebklawoffice.com | Email |
| Counsel for The Davey Tree Expert Company | The Davey Tree Expert Company | Attn: Erika J. Schoenberger, General Counsel 1500 N. Mantua Street Kent OH 44240 | Erika.Schoenberger@davey.com | Email |
| Counsel to Compass Lexecon, LLC | TOGUT, SEGAL & SEGAL LLP | Attn: Albert Togut, Kyle J. Ortiz, Amy M. Oden, Amanda C. Glaubach One Penn Plaza Suite 3335 New York NY 10119 | altogut@teamtogut.com; kortiz@teamtogut.com; aoden@teamtogut.com; aglaubach@teamtogut.com | Email |
| Counsel for Southern Power Company | TROUTMAN SANDERS LLP | Attn: Harris B. Winsberg, Esq., Matthew G. Roberts, Esq. 600 Peachtree St. NE Suite 3000 Atlanta GA 30308 | harris.winsberg@troutman.com; matthew.roberts2@troutman.com | Email |
| Counsel for TURN – The Utility Reform Network | TURN – The Utility Reform Network | Attn: Mark Toney, Thomas Long 785 Market St Suite 1400 San Francisco CA 94103 | mtoney@turn.org; tlong@turn.org | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|--|--|--|---|-------------------|
| Interested Party | Union Pacific Railroad Company | Attn: Tonya W. Conley, Lila L. Howe 1400 Douglas Street STOP 1580 Omaha NE 68179 | bankruptcynotices@up.com | Email |
| US Securities and Exchange Commission | US Securities and Exchange Commission | Attn: Jina Choi, Regional Director San Francisco Regional Office 44 Montgomery Street, Suite 2800 San Francisco CA 94104 | secbankruptcy@sec.gov | Email |
| US Securities and Exchange Commission | US Securities and Exchange Commission | Attn: Office of General Counsel 100 F St. NE MS 6041B Washington DC 20549 | sanfrancisco@sec.gov | Email |
| Counsel to Public Employees Retirement Association of New Mexico | WAGSTAFFE, VON LOEWENFELDT, BUSCH & RADWICK, LLP | Attn: James M. Wagstaffe & Frank Busch 100 Pine Street Suite 725 San Francisco CA 94111 | wagstaffe@wvbrlaw.com; busch@wvbrlaw.com | Email |
| Individual Plaintiffs Executive Committee appointed by the California Superior Court in the North Bay Fire Cases, Judicial Council Coordination Proceeding Number 4955, Pursuant to the terms of the Court's Case Management Order No. 1 | Walkup Melodia Kelly & Schoenberger | Attn: Michael A. Kelly, Khaldoun A. Baghdadi, Max Schuver 650 California Street 26th Floor San Francisco CA 94108 | mkelly@walkuplawoffice.com; kbaghdadi@walkuplawoffice.com; mschuver@walkuplawoffice.com | Email |

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| DESCRIPTION | NAME | ADDRESS | EMAIL | METHOD OF SERVICE |
|--|---|---|--|-------------------|
| Counsel for Aera Energy LLC, Midway Sunset Congeneration Company | Walter Wilhelm Law Group a Professional Corporation | Attn: Riley C. Walter, Michael L. Wilhelm 205 E. River Park Circle Suite 410 Fresno CA 93720 | rileywalter@W2LG.com; Mwilhelm@W2LG.com | Email |
| Counsel for Engineers and Scientists of California, Local 20, IPTE, Counsel for SEIU United Service Workers - West | Weinberg Roger & Rosenfeld | Attn: Emily P. Rich 1001 Marina Village Parkway Suite 200 Alameda CA 94501-1091 | cgray@unioncounsel.net | Email |
| Counsel for Sempra Energy, San Diego Gas & Electric Company, and Southern California Gas Company | White & Case LLP | Attn: J. Christopher Shore 1221 Avenue of the Americas New York NY 10020-1095 | cshore@whitecase.com | Email |
| Counsel for Sempra Energy, San Diego Gas & Electric Company, and Southern California Gas Company | White & Case LLP | Attn: Thomas E Lauria, Matthew C. Brown Southeast Financial Center 200 South Biscayne Boulevard, Suite 4900 Miami FL 33131-2352 | tlauria@whitecase.com; mbrown@whitecase.com | Email |
| Counsel for Ballard Marine Construction, Inc. | Williams Kastner | Attn: Todd W. Blischke 601 Union Street Suite 4100 Seattle WA 98101-2380 | TBlischke@williamskastner.com | Email |
| Counsel for Macquarie Energy LLC | Winston & Strawn LLP | Attn: Michael A. Yuffee 1700 K Street, N.W. Washington DC 20006-3817 | myuffee@winston.com | Email |
| Counsel for Official Committee of Tort Claimants | Baker & Hostetler, LLP | Attn: Eric Sagerman, Esq. and Cecily Dumas, Esq. 11601 Wilshire Boulevard Suite 1400 Los Angeles, CA 90025-0509 | esagerman@bakerlaw.com cdumas@bakerlaw.com | Email |

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Exhibit B

Exhibit B – Service List by Mail Only

| DESCRIPTION | NAME | hADDRESS |
|--|--|--|
| Federal Energy Regulatory Commission | Federal Energy Regulatory Commission | Attn: General Counsel 888 First St NE Washington DC 20426 |
| Counsel for City and County of San Francisco, including all of its agencies, departments, or instrumentalities | Greene Radovsky Maloney Share & Hennigh LLP | Attn: Edward J. Tredinnick Four Embarcadero Center Suite 4000 San Francisco CA 94111-4106 |
| Internal Revenue Service | Internal Revenue Service | Centralized Insolvency Operation 2970 Market St Philadelphia PA 19104-5016 |
| Interested Party John A. Vos | John A. Vos | 1430 Lincoln Avenue San Rafael, CA 94901 |
| Counsel for Philip Verwey d/b/a Philip Verwey Farms | McCormick Barstow LLP | Attn: H. Annie Duong Counsel for Philip Verwey d/b/a Philip Verwey Farms 7647 North Fresno Street Fresno CA 93720 |
| Office of the United States Attorney for the Northern District of California | Office of the United States Attorney for the Northern District of California | Attn: Bankruptcy Unit Federal Courthouse 450 Golden Gate Avenue San Francisco CA 94102 |
| Interested Party Placer County Office of the Treasurer-Tax Collector | Placer County Office of the Treasurer-Tax Collector | Attn: Robert Kanngiesser 2976 Richardson Drive Auburn CA 95603 |
| Counsel for City and County of San Francisco, including all of its agencies, departments, or instrumentalities | San Francisco City Attorney's Office | Attn: Owen Clements 1390 Market Street 7th Floor San Francisco CA 94102 |
| U.S. Bankruptcy Court Northern District of CA | U.S. Bankruptcy Court Northern District of CA | Attn: Honorable Dennis Montali PG&E Corp. Chambers Copy 450 Golden Gate Ave, 18th Floor San Francisco CA 94102 |
| Nuclear Regulatory Commission | U.S. Nuclear Regulatory Commission | Attn: General Counsel U.S. NRC Region IV 1600 E. Lamar Blvd. Arlington TX 76011 |
| Nuclear Regulatory Commission | U.S. Nuclear Regulatory Commission | Attn: General Counsel Washington, DC 20555-0001 |
| Counsel for Project Management, Inc. | Synergy Project Management, Inc. | c/o Law Office of Ivan C. Jen 1017 Andy Circle Sacramento, CA 95838 |

Exhibit B – Service List by Mail Only

| DESCRIPTION | NAME | hADDRESS |
|--|--|--|
| Counsel for the United States Department of Energy | United States Department of Justice – Civil Division | Attn: Matthew J. Troy 1100 L Street, N.W. Room 10030 Washington, DC 20530 |